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October 23, 2014

Via ECF

Honorable Denise L. Cote
United States District Court for the
Southern District of New York United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *In re Application of The Coalition To Protect Clifton Bay and Louis Bacon for an Order Pursuant to 28 U.S. C. § 1782 to Conduct Discovery for Use in Foreign Proceedings, 14 Misc. 258 (DLC)*

Dear Judge Cote:

We are the attorneys for Respondent Stephen J. Feralio. Pursuant to the Court's direction at the September 11, 2014 court conference, we write to update the Court regarding our efforts to review and produce materials to Nygard International Partnership and Nygard Inc. responsive to the subpoena issued by Petitioners, The Coalition To Protect Clifton Bay and Louis Bacon.

For the period October 16, 2014 - October 22, 2014, Mr. Feralio devoted approximately 45 hours to reviewing and cataloguing responsive materials. Over the course of the week, Mr. Feralio reviewed approximately 1,602 video and other electronic files and designated approximately 145 files as responsive. Many of the files included in this production are electronic files responsive to Request No. 7, which seeks documents concerning Mr. Bacon, his representatives and entities.

Today, we will be sending to counsel for Nygard International Partnership and Nygard Inc. a hard drive containing approximately 22 GB of responsive materials in 145 separate files, Bates stamped SF00004933-SF00005077.

We are available to answer any questions the Court may have regarding our efforts. Per

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the Court's instructions, we will further update the Court next week on our progress.

Respectfully submitted,

s/ Steven D. Feldman

Steven D. Feldman

cc: Counsel for Petitioners (by ECF)
Counsel for Nygard International Partnership and Nygard Inc. (by ECF)